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Counsel for the Plaintiff

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FIRESTAR DIAMOND, INC., *et al.*

Debtors.

Chapter 11

No. 18-10509 (SHL)

(Jointly Administered)

RICHARD LEVIN, Chapter 11 Trustee of
FIRESTAR DIAMOND, INC., FANTASY, INC.,
and OLD AJ, INC. f/k/a A. JAFFE, INC.,

Plaintiff,

v.

NIRAV DEEPAK MODI, MIHIR BHANSALI,
and AJAY GANDHI,

Defendants.

Adv. Proc. No. 19-1102 (SHL)

NOTICE OF PROPOSED ORDER

PLEASE TAKE NOTICE that, in accordance with the *Memorandum of Decision* (Adv. Dkt. 69) issued by this Court on October 15, 2021 in the above-captioned adversary proceeding, Plaintiff Richard Levin, not individually but solely in his capacity as liquidating trustee (the

“Trustee” or “Plaintiff”) of the above-captioned debtors, submits the attached proposed order for the Court’s consideration.

Dated: October 19, 2021
New York, New York

Respectfully submitted,

JENNER & BLOCK LLP

By: /s/ Vincent E. Lazar

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